

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CLIFFORD THOMAS,

Plaintiff/Counterclaim Defendant,

v.

RAYMOND ROBERTS,

Defendant/Counterclaimant.

Civil Action No. 16-1581 (AJT/MSN)

**DEFENDANT/COUNTERCLAIMANT RAYMOND ROBERTS’
MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Defendant/counterclaimant Raymond Roberts, pursuant to Fed. R. Civ. P. 37(a), moves for an order compelling a complete production of responsive documents from plaintiff/counterclaim defendant. The grounds for the motion are fully set forth in the accompanying memorandum. The undersigned certifies that a good-faith effort to narrow the areas of disagreement has been made in accordance with Local Rules 7(E) and 37(E).

Respectfully submitted,

/s/ Charles B. Wayne

Charles B. Wayne (VSB # 24954)

Katherine Ruffing (VSB # 79006)

Brian J. Young

DLA PIPER LLP (US)

500 8th Street, N.W.

Washington, D.C. 20004

(202) 799-4253

(202) 799-5253 (fax)

charles.wayne@dlapiper.com

katie.ruffing@dlapiper.com

brian.young@dlapiper.com

Counsel for Defendant/Counterclaimant

Raymond Roberts

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2017, a copy of the foregoing was served by electronic mail using the CM/ECF system, which will then send notification of such filing to all counsel of record.

/s/ Charles B. Wayne

Charles B. Wayne